

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

**IN RE:** ) **Bankruptcy No. 19-21807-GLT**  
William D. Eckman and )  
Sandra L. Eckman, ) **Chapter 13**  
                          **Debtors,** )  
Freedom Mortgage Corporation, )  
                          **Movant,** ) **Claim No. 12**  
                          **vs.** )  
William D. Eckman, Sandra L. Eckman, )  
and )  
Ronda J. Winnecur, Chapter 13 Trustee, )  
                          **Respondents.** ) **Document No.**

**DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT**

**AND NOW**, comes the Debtors, William D. Eckman and Sandra L Eckman, by and through their attorneys, Calaiaro Valencik, and presents the following:

1. This case was filed on May 2, 2019, under Chapter 13 of the United States Bankruptcy Code.
2. The Notice of Mortgage Payment Change was filed by Freedom Mortgage on November 10, 2023.
3. The payment change decreases the monthly payment to Freedom Mortgage by \$9.37.
4. The Debtors' most recent proposed plan dated November 2, 2022 is sufficiently funded for the Payment Change. There is no reason to amend the Debtors' Chapter 13 Plan.

**Respectfully submitted,**

**Dated:** December 15, 2023

**BY:** /s/ David Z. Valencik  
**David Z. Valencik, Esquire, PA I.D. #308361**  
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